

**FINAL  
SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT  
FOR THE PROPOSED  
CONSTRUCTION OF PERSONALLY OWNED (POV)  
PARKING  
FOR THE  
113TH WING**

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**District of Columbia Air National Guard  
Joint Base Andrews-Naval Facility Washington  
Prince George's County, Maryland**

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**May 2013**

## **SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT**

### **Proposed Construction of Personally Owned Vehicle (POV) Parking for 113<sup>th</sup> Wing, District of Columbia Air National Guard Joint Base Andrews-Naval Facility (JBA), Washington, MD**

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|--------------------|
| <b>COVER SHEET</b> |
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#### **Responsible Agency**

113th Wing of the District of Columbia Air National Guard (DC ANG) and the 11th Wing (11 WG), Joint Base Andrews-Naval Air Facility Washington, Maryland (JBA)

#### **Proposed Action**

Under the Proposed Action the DC ANG would construct a satellite surface parking facility to support the mission of the DC ANG 113<sup>th</sup> Wing. The facility would be built outside the DC ANG license area to replace parking removed from within the license area, as a result of security mandates outlined in the *DoD Minimum Antiterrorism Standards for Buildings*, 9 February 2012.

The Draft SEA and FONSI have been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321-4347), Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Sections 1500-1508).

#### **Report Designation**

Draft Supplemental Environmental Assessment (SEA)

#### **Written comments and inquiries regarding this document should be addressed to:**

Ms. Anne Hodges, 11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

## Abstract

The purpose of the proposed action is to support the current and future demand of the DC ANG training and security actions within the National Capital Region (NCR). Current parking facilities within the license area afforded to the DC ANG cannot support the present staffing and the present parking configuration does not comply with UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*, 9 February 2012. Changes needed to implement these standards require reconfiguration of existing facilities to provide a minimum standoff distance buffer zone (*Appendix B: Section B-1.1: Standoff Distances*). This change would significantly lessen the already insufficient parking facilities and thus, would not provide adequate facilities for all of the required personnel.

This SEA is tiered to the approved *Environmental Assessment for FY07-11 BRAC Construction Requirements at Andrews Air Force Base, Maryland*, September 2007. The approved EA addressed the construction of this parking lot facility for the DC ANG, however the site was incorrectly assessed as an upland forest (of less than 20 years of age) at the time the study was conducted. The actual condition of the proposed site is lowland, with a significant portion of the forest classified as a Forested Palustrine Wetland. An on-site investigation reflects that a portion of the site adjacent to the proposed development area must be identified as a wetland buffer with adjacent wetland, based on observed soil, vegetative and hydrologic conditions. Additionally, review of historic aerial photography (available on the Prince Georges County GIS website (PGAtlas.com)) shows the site as forested at least since 1965. However, some trees on site have been identified in age up to 100 years.

The SEA considers the potential environmental consequences to human health and the natural environment and examines the effects of the proposed DC ANG parking facility, including the required No Action Alternative. Under the Proposed Action, JBA would replace parking facilities allocated to DC ANG by constructing a satellite parking facility outside of the license area which would replace some of the parking removed by the appropriate antiterrorism standards mandate. It should be noted that the proposed construction of the satellite parking facility would not change usage patterns at JBA.

**DRAFT SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT**  
**Proposed Construction of Personally Owned Vehicle (POV) Parking for 113<sup>th</sup> Wing, District of Columbia**  
**Air National Guard Joint Base Andrews-Naval Facility (JBA), Washington, MD**

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## **1. Purpose of and Need for Proposed Action**

### **1.1 Introduction**

Implementation of the 2005 Base Realignment and Closure (BRAC) Commission recommendations included a redistribution of up to 9 aircraft to the 113<sup>th</sup> Wing of the DC ANG in response to the realignment of Cannon Air Force Base. The DC ANG is increasing its force at the JBA facility.

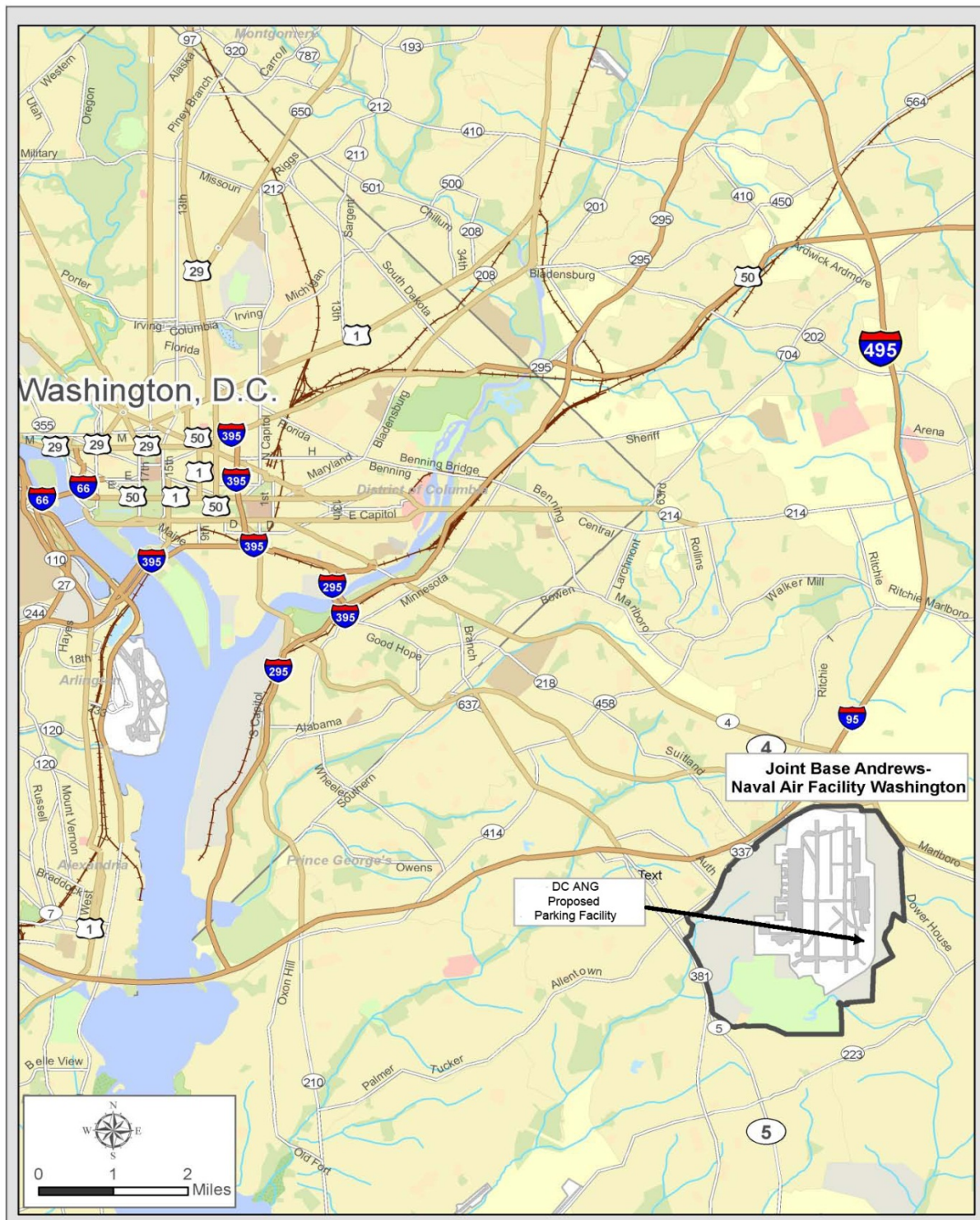
It is important to note that the environmental impacts of the implementation of the 2005 BRAC Law at JBA were assessed in the *Final Environmental Assessment for Fiscal Year 07-11 BRAC Construction Requirements at Andrews Air Force Base, Maryland* (BRAC 2007). Specifically, the BRAC Environmental Assessment (EA) addressed the overall increase in personnel at JBA resulting from the BRAC Law. Construction of the proposed satellite parking facility was evaluated in the EA but the details of the proposed site were incorrect. The presence of wetlands and a mature forest community necessitate a supplemental evaluation, based on the correct information. Construction of the proposed parking facility would not change the nature of operations or usage patterns at JBA.

### **1.2 Purpose and Need for the Proposed Action**

The purpose of the Proposed Action is to provide 138 parking spaces for use by DC ANG personnel. This facility would replace 138 of the 155 parking spaces lost due to reconfiguration existing site to meet current antiterrorism standards, as outlined in UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*, 9 February 2012. The original proposed action was to provide 248 spaces, however the proposal was amended to avoid impact to existing wetland buffer

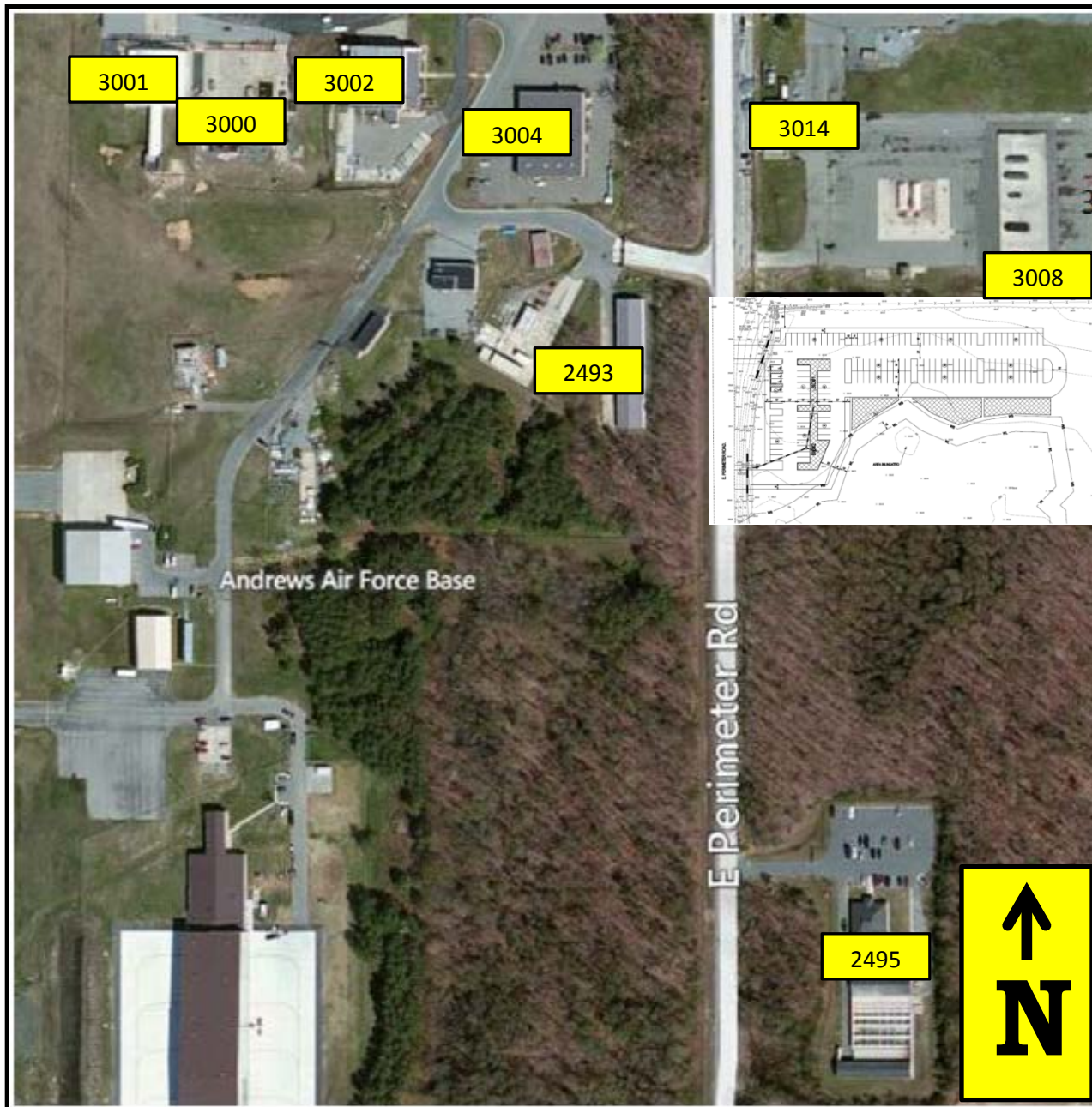
### **1.3 Location of the Proposed Action**

JBA is five miles southeast of Washington, D.C. in southern Prince George's County, MD (Figure 1-1). JBA occupies 4,346 acres abutting Interstate 495, between MD Route 4 (Pennsylvania Avenue) and MD Route 5 (Branch Avenue). The Patuxent River is approximately seven miles east of JBA. The communities of Morningside, Woodyard, Clinton, and Camp Springs, Maryland border JBA to the north, east, south, and west, respectively. Surrounding land use consists of residential, industrial, commercial, and institutional areas, as well as woodlands. The total population living and working on JBA, including partner units, is approximately 16,697 persons (JBA 2010).



**Figure 1-1**  
Joint Base JBA-Naval Facility Washington, MD Vicinity Map





**Figure 1-2**  
Proposed Parking Lot Siting

## **1.4 Background**

The Personally Owned Vehicle (POV) parking facility for DC ANG was addressed in the *Environmental Assessment for FY07-11 BRAC Construction Requirements at Andrews Air Force Base (EA)*, and its associated *Finding of No Significant Impact (FONSI)*. New and conflicting information was discovered during the preliminary engineering phase of this project. This new information necessitated the “tiering” of a Supplemental Environmental Assessment (SEA) in order to correctly evaluate the environmental impacts of the POV parking facility site.

“Tiering” is one of the methods described by CEQ to help streamline the NEPA process, and reduce paperwork and delay. The CEQ regulations define “tiering” as “the coverage of general matters in broader environmental impact statements (such as national program or policy statements) with subsequent narrower statements or environmental analyses (such as regional or basin-wide program statements or ultimately site-specific statements) incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared” (*Title 40 Code of Federal Regulations [CFR] Part 1508.28*).

## **1.5 Summary of Key Environmental Compliance Requirements**

### **1.5.1 National Environmental Policy Act**

NEPA (42 United States Code [U.S.C.] Section 4321-4347) is a federal statute requiring the identification and analysis of potential environmental impacts of proposed federal actions before those actions are taken. NEPA mandated a structured approach to environmental impact analysis that requires federal agencies to use an interdisciplinary and systematic approach in their decision-making process. This process evaluates potential environmental consequences associated with a proposed action and considers alternative courses of action. The intent of NEPA is to protect, restore, or enhance the environment through well-informed federal decisions.

Air Force Policy Directive (AFPD) 32-70, Environmental Quality, states that the USAF will comply with applicable federal, state, and local environmental laws and regulations, including NEPA. The USAF’s implementing regulation for NEPA is *The Environmental Impact Analysis Process (EIAP)*, 32 CFR 989, as amended.

This Supplemental EA analyzes the Proposed Action and the No Action Alternative. If the analyses presented in the Supplemental EA indicate that implementation of the Proposed Action would not result in significant environmental impacts, a FONSI will be prepared. A FONSI briefly presents reasons why a Proposed Action would not have a significant impact on the human environment. If significant environmental issues are identified and cannot be mitigated, an Environmental Impact Statement (EIS) would be prepared, or the Proposed Action would be abandoned and no further action would be taken.

### **1.5.2 Integration of Other Environmental Statutes and Regulations**

To comply with NEPA, the planning and decision-making process for actions proposed by federal agencies, involves a study of other relevant environmental statutes and regulations. The NEPA process, however, does not replace procedural or substantive requirements of other environmental statutes and regulations. It addresses them collectively in the form of an EA or EIS, which enables the decision-maker to have a comprehensive view of the major environmental issues and requirements associated with the



Proposed Action. According to CEQ regulations, the requirements of NEPA must be integrated “with other planning and environmental review procedures required by law or by agency so that all such procedures run concurrently rather than consecutively.”

## **1.6 Public Involvement**

The Intergovernmental Coordination Act and EO 12372, *Intergovernmental Review of Federal Programs*, require federal agencies to cooperate with and consider state and local views in implementing a federal proposal. Air Force Instruction (AFI) 32-7060 requires the USAF to implement a process known as Interagency and Intergovernmental Coordination for Environmental Planning (IICEP), which is used for the purpose of agency coordination and implements scoping requirements. Through the IICEP process, JBA will notify relevant federal, state, and local agencies; and the surrounding communities of the Proposed Action and provide them sufficient time to make known their environmental concerns specific to the action.

## **1.7 Introduction to the Organization of this Document**

This Supplemental EA is organized into 7 Sections.

- Section 1 contains the Purpose of and Need for the Proposed Action. This section provides details of the location of the Proposed Action; background information on JBA; a description of interagency coordination and community involvement; and an introduction to the organization of the Supplemental EA.
- Section 2 provides a Detailed Description of the Proposed Action; a description of the No Action Alternative; a description of the decision to be made; and identification of the preferred alternative.
- Section 3 contains a general description of Environmental Effects, namely the biophysical resources and baseline conditions that could potentially be affected by the Proposed Action or the No Action Alternative, and it presents an analysis of the environmental consequences.
- Section 4 analyzes the Cumulative and Adverse Impacts on JBA.
- Section 5 lists the Preparers of the SEA, and
- Section 6 lists the References or sources of information used in the preparation of this document.
- Appendix A includes the IICEP distribution list, a copy of the IICEP letter mailed to the agencies for this action, and agency and public comments on the Draft Supplemental EA, once received.

The draft FONSI for the proposed construction of the parking facility is in Appendix B.

## **2. Description of Proposed Action and Alternatives**

### **2.1 Detailed Description of the Proposed Action**

The purpose of the proposed action is to support the current and future demand of the DC ANG training and security actions within the National Capital Region (NCR).

Under the Proposed Action, DC ANG would construct a satellite parking facility on a 2.6 acre wooded site south of its designated license area. The Proposed Action would provide 138 parking spaces for use by DC ANG personnel. This facility would replace 138 of the 155 parking spaces lost due to reconfiguration existing site to meet current antiterrorism standards, as outlined in UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*, 9 February 2012.

Current parking facilities within the license area afforded to the DC ANG cannot support the present staffing. Also, the present parking configuration does not comply with UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*, 9 February 2012. Changes needed to implement these standards require reconfiguration of existing facilities to provide a minimum standoff distance buffer zone (*Appendix B: Section B-1.1: Standoff Distances*). This change would significantly lessen the already insufficient parking facilities and thus, would not provide adequate facilities for all of the required personnel. The Proposed Action would offset some of the impacts created due to reconfiguration existing site to meet current antiterrorism standards.

The site for the Proposed Action currently contains mature forest and non-tidal wetland buffers. The proposed action would remove 2.6 acres of forest and permanently impact 0.21 acres of wetland buffer. No wetland would be permanently impacted. Air Force policy regarding wetland management is derived from compliance with *Executive Order 11990, Protection of Wetlands* and is detailed in Chapter 3 of *Air Force Instruction (AFI) 32-7064*.



Figure 2-1

Areas identified for parking loss to meet AFTP stand-off distances (113 WG IDP, 2012)

## 2.2 Alternatives Considered but Not Carried Forward

As part of the NEPA process, reasonable alternatives to the Proposed Action must be considered. The development of reasonable alternatives involved discussions with JBA and tenant personnel to identify the purpose and need of the Proposed Action, alternative courses of action, designs, locations, and management practices for achieving the purpose and need. Consistent with the intent of NEPA, this screening process focused on identifying a range of reasonable project-specific alternatives and, from that, developing proposed actions that could be implemented in the foreseeable future. Alternatives deemed infeasible did not undergo further analysis.

The necessity of the proposed action for construction of a new satellite parking facility (as stated above) resulted from newly imposed limitations set forth by the *DoD Minimum Antiterrorism Standards*. A planning review of the DC ANG license area and areas within a reasonably distanced outside radius, provided no alternative sites for evaluation. Constraints within the evaluated radius area included the 'Pathfinder Fence'. Parking of non-government vehicles is not permitted within the Pathfinder Fence. Current antiterrorism standards also constrain all surrounding buildings by diminishing their existing parking facilities. The area surrounding the DC ANG is at present completely developed, with the exception of the aforementioned wooded site to the south of the license area.

## **2.3 No Action Alternative**

Under the No Action Alternative, the satellite parking facility would not be built and significant number of essential personnel would be unable to efficiently access base facilities for daily and emergency activities. Currently 577 weekday personnel and 1197 weekend personnel must report for duty. Increased staffing due to BRAC activity will be augmenting these numbers. The No Action Alternative would likely be an infeasible alternative as the DC ANG would not be able to meet its primary objectives.

## **2.4 Decision to be Made and Identification of Preferred Alternative**

JBA would make one of the following decisions:

- Implement the Proposed Action
- Not implement the Proposed Action (No Action Alternative)

Based on the primary criteria of finding a location that best suits the mission of the DC ANG, proximity to existing facilities, site vacancy, current and proposed land use, JBA determined the Proposed Action to be the best available location. Therefore, the Preferred Alternative is the implementation of the Proposed Action as selected by JBA.

## **3. ENVIRONMENTAL EFFECTS**

Section 3 describes the biophysical resources and baseline conditions that could potentially be affected by the Proposed Action or the No Action Alternative. This section also presents an analysis of the environmental consequences. In compliance with NEPA, CEQ regulations, and 32 CFR Part 989, as amended, the description of the affected environment focuses on those resources and conditions potentially affected by the Proposed Action. This Supplemental EA examines potential, site-specific effects of the Proposed Action on two resources: water resources, and biological resources. These resource areas were identified as being potentially affected by the Proposed Action, and include applicable critical elements of the human environment whose review is mandated by EO, regulation, or policy.

Other resource areas (noise, land use, air quality, safety, geological resources, cultural resources, socio-economics and environmental justice, and hazardous materials and waste) potentially affected by the Proposed Action were found to be sufficiently described and evaluated in the approved BRAC EA. The Proposed Action would not impact these other resource areas and therefore they were not analyzed further.

Under the Proposed Action, JBA would construct a satellite POV parking facility to replace the existing facilities that do not meet the current *DoD Minimum Antiterrorism Standards for Buildings*. The proposed construction would not change usage patterns at JBA. All of the construction impacts would be temporary and similar to those described in the BRAC EA.

### **3.1 Water Resources**

Water resources include groundwater, surface water, floodplains, and wastewater and stormwater systems. Evaluation identifies the quantity and quality of the resource and demand on the resource for

potable, irrigation, and industrial purposes. Groundwater, floodplains, and wastewater should not be impacted from the Proposed Action and were not analyzed in the Supplemental EA.

Well engineered stormwater systems would reduce high amounts of sediment and other contaminants, which would otherwise flow directly into surface waters. Areas with higher proportions of impervious surfaces, such as urban areas, would require more stormwater management.

### **3.1.1 Existing Conditions**

Stormwater at JBA is currently conveyed through oil/water separators and underground stormwater management structures within the industrial areas of JBA. Stormwater is also mitigated by means of drainage swales and ditches in other areas of JBA. Ultimately, all surface runoff is conveyed into a network of primarily underground culverts, which is later discharged through 8 major storm-drain outfalls. Stormwater is eventually discharged into Henson Creek, Meetinghouse Branch, and Payne Branch to the west; Cabin Creek and Charles Branch to the east; and Piscataway Creek to the southeast. All of these streams ultimately flow into the Potomac or Patuxent Rivers (JBA 2010).

To manage on-base stormwater runoff and protect the quality of surface water on and within the vicinity of the base, JBA has been issued two general National Pollutant Discharge Elimination System (NPDES) permits: (1) Multi-Sector General Permit for Stormwater Associated with Industrial Activities; and (2) NPDES General Permit for Storm Water Discharges from state and federal Small Municipal Separate Storm Sewer Systems. In order to comply with the requirements of these permits, JBA has prepared and implemented a Stormwater Pollution Prevention Plan (SWPPP) that includes water quality monitoring requirements and Best Management Practices (BMPs) to minimize the potential for contaminants to reach nearby surface waters (JBA 2010).

### **3.1.2 Environmental Consequences**

The implementation of the Proposed Action would result in an increase of impervious surface area. To help offset this increase, the proposed new parking facility would integrate low-impact stormwater management features and bioretention devices. Specific management features such as infiltration structures would be selected during the project design phases in accordance with the SWPPP. Long-term direct beneficial effects would be expected from the complete build out of the satellite parking facility.

Temporary, direct, and minor adverse effects from stormwater volume and reduced quality, might occur during construction activities associated with the Proposed Action. However, these adverse effects would be limited to the immediate area of construction and would subside at the end of construction activities. The Proposed Action would comply with Maryland's Regulatory Program for Sediment and Erosion Control at Construction Sites, which requires employing erosion control BMPs at all sites with disturbances of greater than 5000 square feet. Erosion and sedimentation controls would be in place during construction to reduce and control siltation or erosion impacts on areas outside of the construction site.

The SWPPP identifies control measures and BMPs to reduce sediment transfer and soil erosion (JBA 2010). Adherence to these requirements minimizes degradation of receiving waters and adjacent environments. Additional requirements for management of stormwater runoff are provided in *Maryland Stormwater Management Guidelines for State & Federal Projects*, and specific methods are provided in the *2000 Maryland Stormwater Design Manual* or the most current version. During final design of

structures and landscaping of the Proposed Action, a stormwater management plan would be developed and submitted to the Maryland Department of the Environment, and state concurrence sought before implementation of the Proposed Action. Project design and Implementation of the Proposed Action would have very little impact on peak discharge of Piscataway Creek, which eventually flows downstream into the Patuxent River. Adherence to proper engineering practices and applicable codes and ordinances would reduce stormwater runoff-related impacts to an insignificant level. Construction would meet all appropriate federal and state stormwater regulations and EISA 2007 (JBA 2011).

### **3.2 Biological Resources**

Biological resources include native or naturalized plants and animals, and their associated habitats such as wetlands, forests, and grasslands. Sensitive and protected biological resources include plant and animal species that are listed for protection on both the state (Maryland Department of Natural Resources [MDNR]) and federal (United States Fish and Wildlife Service [USFWS]) levels. Determining which species occur in an area affected by implementation of an action can be accomplished through literature reviews and coordination with appropriate federal and state regulatory agency representatives, resource managers, and other knowledgeable experts.

Wetlands are an important natural system with diverse biological and hydrological functions. These functions include water quality improvement, groundwater recharge and discharge, pollution mitigation, nutrient recycling, unique plant and wildlife habitat provision, stormwater attenuation and storage, sediment detention, and erosion protection. Wetlands are protected as a subset of the Waters of the United States under Section 404 of the CWA and incorporate deep-water and special aquatic habitats (including wetlands). The U.S. Army Corps of Engineers (USACE) defines wetlands as “those areas that are inundated or saturated with ground or surface water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR Part 338).

#### **3.2.1 Existing Conditions**

The BRAC EA states, in section 3.3 *Biological Resources*, that nearly eighty percent of the main base of JBA is developed or intensely managed. A wetland delineation conducted by an outside consulting engineering firm in February 2012, and subsequently confirmed by Maryland Department of the Environment (MDE) and the Army Corps of Engineers, shows that this specific site is not developed. At this time, the site is covered by a mature mixed hardwood forest predominated by oaks. Forested Palustrine Wetland buffers make up 0.21 acres of the 2.6 acre forested site. The buffer area is defined as a 25' zone measured from the edge of the delineated wetland, in accordance with the 1989 *Maryland Non-tidal Wetlands Protection Act*.

The BRAC EA states, in section 3.3 *Biological Resources* that wildlife on JBA consists of birds and mammals. No sensitive wildlife is known to occur at JBA. Sensitive plants identified on JBA have not been observed at this site and would not be affected by the Proposed Action. Should proposed projects occur in the vicinity of sensitive species, additional NEPA analysis would be required.

In October 2012, an outside consultant assessed potential construction impacts within a restricted infiltration remediation area identified as LF-05. The proposed action is located within the northern portion the LF-05 drainage basin, outside the landfill. No surface or groundwater discharge should be increased within this drainage basin.

#### **3.2.2 Environmental Consequences**



As guided by *Executive Order (EO) 11990, Protection of Wetlands*, and *Air Force Instruction (AFI) 32-7064, 17 September 2004, Integrated Natural Resources Management*, notification for wetland impacts must be made. The Air Force policy regarding wetland management detailed in Chapter 3 of AFI 32-7064 says that “to the maximum extent practicable the Air Force will avoid actions that either destroy or adversely modify wetlands”. Jurisdictional wetland buffers within the project area occur within the limits of disturbance of the proposed parking facility. Actual wetlands occur adjacent to the proposed site, outside the project area, to the south and west.

The wetland presently receives overland flow, discharge from SWM pipes, and water from several culverts. Impacts to this wetland buffer would occur as a result of the construction of the proposed parking facility. In addition, impacts to the wetlands could occur due to landform modifications, which may, but it is not anticipated to, impede flow from sources feeding these adjacent wetlands.

This reported impact is to wetland buffer and not the actual wetland. Any loss of wetland acreage would require a U.S. Army Corps of Engineers Clean Water Act (CWA) Section 404(b) permit. The USAF is committed to mitigating the loss of the wetland area through either creation of a similar feature nearby, or enhancing the existing wetlands, as required. Permitting would be determined based on negotiations between the USAF, DC ANG and the MDE.

During the EA development process, other alternative locations, as noted in paragraph 2.2, were reviewed under the requirements of the National Environmental Policy Act (NEPA), but were eliminated from further detailed analysis as they did not meet the goals of the stated purpose and need for action. Additionally, it was determined that implementation of these other alternatives would not be practicable and could result in an overall greater environmental impact. Based on the EA it can be determined that the only practicable alternative for development, as described in the “Description of the Proposed Action”, would be to construct a satellite parking facility on a 2.6 acre wooded site south of its designated license area.



As guided by the AFI 32-7064, 17 September 2004, *Integrated Natural Resources Management*, and the *Revised Integrated Natural Resources Management Plan (2006-2011) for JBA*, any removal of trees must be mitigated. Construction of the 113 ANG parking facility would result in the long-term loss of 2.6 acres of mixed hardwood forest. The size of the forested area to be cleared represents a negligible (<0.0001) percentage of the remaining forest cover within the State of Maryland (MDNR 2003) and a negligible (<0.003) percentage of forest cover at JBA. Following project implementation, DC ANG would replace 60 percent of the lost forest canopy for the construction of the

parking lot per the *JBA Environmental Protection Standards for Contracts (2012)*. Replacement planting will be 1.6 acres.

The location of the replacement planting has been identified as the CDC site located at the NW corner of the intersection of Dower House Road and Fetchet Avenue.

Based on the *Environmental Protection Standards for Contracts*, replacement trees must be native species, with a 2-5 inch caliper, and arranged in stands similar to those removed. Additionally, the project would meet or exceed regulations required by the State of Maryland *Forest Conservation Act*, per those negotiations.

The construction activities associated with the Proposed Action would not impact wildlife reproduction, movement, or habitat.

### **3.2.3 Remediation site LF-05 Consequences**

The Assessment Document prepared by outside consultants (Appendix C) states that construction activities must not increase flow to the tributaries of Piscataway Creek located southwest of LF-05. The existing drainage patterns show that water originating from the Proposed Action is within the northern portion of the drainage area for LF-05, which flows in a WSW direction. Surface and ground water originating from area of the Proposed Action does not currently contribute water volume to the restricted discharge area outlined in the Assessment document.

Proposed temporary sediment and erosion control measures and proposed permanent stormwater measures will maintain existing flow patterns and volumes. The Proposed action will not contribute any excess flow during construction or after completion.

### **3.3 No Action Alternative**

Under the No Action Alternative, the Proposed Action would not be implemented and existing conditions would remain as-is. The No Action Alternative would reduce the overall organization and effectiveness of DC ANG operations at JBA.

#### **4. CUMULATIVE AND ADVERSE IMPACTS**

Cumulative impacts to environmental resources result from the incremental effects of an action when combined with other past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor, but collectively substantial, actions undertaken over a period of time by various agencies (federal, state, and local) or individuals. In accordance with NEPA, a discussion of cumulative impacts resulting from projects that are proposed (or anticipated over the foreseeable future) is required.

##### **4.1 Impact Analysis**

The scope of the cumulative effects analysis involves both the geographic extent of the effects and the time frame in which the effects could be expected to occur, as well as a description of what resources could potentially be cumulatively affected. When addressing cumulative impacts on wetlands and waters of the United States, the geographic extent for the cumulative effects analysis is the watershed in which the Proposed Action and alternatives have the potential to impact, primarily concentrating on past, present, and reasonably foreseeable actions on and within JBA and the surrounding ecosystem.

The 2007 BRAC EA assessed cumulative impacts resulting from BRAC-related projects (increased personnel, transportation system improvements, conversion of MGMC from a hospital to outpatient care facility, addition of Air National Guard Headquarters to JBA). Cumulative impacts from these projects were found to be minimal to most resource areas. The Proposed Action comprises a small portion of the current and planned development activities at JBA and within the NCR, and would have negligible cumulative impacts on the resources at JBA.

Any water resource or biological resource impacts will be mitigated either on or offsite to the satisfaction of regulating bodies.

## **5. Preparers**

This SEA has been prepared under the direction of the DC ANG at Joint Base Andrews-Naval Facility Washington (JBA) by Loiederman Soltesz Associates Inc. The individuals who contributed to the preparation of this document are listed below.

Jason Mills, PE  
B.S., Civil Engineering  
Years of Experience: 15

Andie Murtha  
ISA Certified Arborist  
BLA Landscape Architecture  
BA History  
Years of Experience: 10

Ed Carroll, PE  
Director of Environmental Engineering, LSA  
BA Urban Planning  
Years Experience: 25

## 6. References

- JBA 2010      General Plan Update, Joint Base Andrews-Naval Facility, Washington, Maryland. January 2010.
- JBA 2011      General Plan Environmental Assessment for Joint Base Andrews-Naval Facility Washington, Maryland. April 2011. Prepared for: US Air Force Center for Engineering and the Environment.
- JBA 2007      Revised Integrated natural Resources Management Plan (2006-2011). June 2007. Prepared for Andrews Air Force Base by USACOE Baltimore District
- JBA            Joint Base Andrews Environmental Protection Standards for Contracts (2012)
- AFI 2004      Air Force Instruction 32-7064. September 2004. Integrated Natural Resources Management.
- JBA 2007      Final Environmental Assessment for FY07-11 BRAC Construction Requirements at Andrews Air Force Base, Maryland. September 2007. Prepared for: US Air Force Center for Engineering and the Environment.
- DCANG 2004   Antiterrorism /Force Protection Update. August 2004. Prepared for: District of Columbia Air National Guard 113<sup>th</sup> Wing.
- DOD 2012      Unified Facilities Criteria. DOD Minimum Antiterrorism Standards for Buildings. UFC 4-010-01. February 2012.
- MDE 2011      Maryland Non-tidal Wetland Mitigation Guidance. January 2011. Prepared for MDE by Nontidal Wetlands and Waterways Division

## **Appendix A**

Interagency and Intergovernmental coordination for Environmental Planning  
Correspondence List and Letter





DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 11TH WING (AFDW)  
ANDREWS AIR FORCE BASE, MARYLAND 20762

17 January 2013

MEMORANDUM FOR: SEE DISTRIBUTION

FROM: 11 CES/CEA  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

SUBJECT: Draft Supplemental Environmental Assessment and Finding of No Significant Impact for Construction of Personally Owned Vehicle Parking for the 113th Wing, District of Columbia Air National Guard on Joint Base Andrews-Naval Facility, Washington, Maryland

1. Joint Base Andrews-Naval Air Facility (JBA) has prepared a Draft Supplemental Environmental Assessment (SEA) and Finding of No Significant Impact (FONSI) for Construction of Personally Owned Vehicle (POV) Parking for the 113th Wing, District of Columbia Air National Guard (DC ANG). The POV parking facility for DC ANG was addressed in the *Environmental Assessment for FY07-11 BRAC Construction Requirements at Andrews Air Force Base*, and its associated *Finding of No Significant Impact (FONSI)*, September 2007. New and conflicting information regarding the presence of wetlands was discovered in August 2011 during the preliminary engineering phase of this project. This new information necessitated the "tiering" of an SEA in order to correctly evaluate the environmental impacts of the POV parking facility.
2. The SEA and FONSI have been prepared pursuant to NEPA, 42 U.S.C. 4321 et seq, and CEQ regulations at 40 CFR Parts 1500-1508. The SEA considers the potential environmental consequences to human health and the natural environment and examines the effects of the proposed DC ANG parking facility, including the required No Action Alternative. The SEA shows that the Proposed Action would not significantly impact the environment and supports a FONSI. Consequently, an Environmental Impact Statement is not needed.
3. In accordance with Executive Order 12372, Intergovernmental Review of Federal Programs, we request your review of the Draft EA and FONSI for the proposed DC ANG parking facility. The documents are attached and available for review and comment until 17 February 2013. They may also be found online at <http://www.andrews.af.mil/library/environmental/index.asp>.

*Vigilance - Precision - Global Impact*

4. Your assistance is greatly appreciated. Please address written comments within 30 days from the date of this letter to Anne Hodges, 11 CES/CEAO, 3466 North Carolina Avenue, Joint Base Andrews, MD 20762 or e-mail [anne.hodges@afncr.af.mil](mailto:anne.hodges@afncr.af.mil). If you need further information, please contact me at 301-981-1426.



ANNE M. HODGES  
Environmental Planner

Attachments:

1. Distribution List (listed on next page)
2. Draft SEA and FONSI

**Distribution List**

Mrs. Linda C. Janey, JD  
Director, Maryland State Clearinghouse  
Maryland Office of Planning, Room 1104  
301 West Preston St.  
Baltimore, MD 21201-2365  
[ljaney@mdp.state.md.us](mailto:ljaney@mdp.state.md.us)

Ms. Genevieve Larouche  
US Fish & Wildlife Service  
Chesapeake Bay Field Office  
177 Admiral Cochrane Dr.  
Annapolis, MD 21401  
[genevieve\\_larouche@fws.gov](mailto:genevieve_larouche@fws.gov)

Ms. Fern Piret  
Planning Director  
Maryland-National Capital Park and Planning Commission  
Prince George's County Planning Department  
14741 Governor Oden Bowie Dr., Room 4150  
Upper Marlboro, MD 20772  
[fern.piret@ppd.mnccppc.org](mailto:fern.piret@ppd.mnccppc.org)

## Notice of availability

Draft Supplemental Environmental Assessment and Finding of No Significant Impact for Joint Base Andrews-Naval Air Facility Washington, Maryland

A Draft Supplemental Environmental Assessment, SEA, has been prepared for Construction of Personally Owned Vehicle, POV, parking for the 113th Wing, District of Columbia Air National Guard on Joint Base Andrews-Naval Facility, Washington, Maryland.

The POV parking facility for DC ANG was addressed in the Environmental Assessment for FY07-11 Base Realignment and Closure Construction Requirements at Andrews Air Force Base, and its associated Finding of No Significant Impact, FONSI, September 2007. New and conflicting information regarding the presence of wetlands was discovered in August 2011 during the preliminary engineering phase of this project. This new information necessitated the "tiering" of an SEA in order to correctly evaluate the environmental impacts of the POV parking facility.

The SEA and FONSI have been prepared pursuant to National Environmental Policy Act,

42 U.S.C. 4321 et seq, and Council on Environmental Quality regulations at 40 Code of Federal Regulations, Parts 1500-1508.

The purpose of the SEA is to consider the potential environmental consequences to human health and the natural environment; as well as examine the effects of the proposed DC ANG parking facility, including the required No Action Alternative. The SEA shows that the Proposed Action would not significantly impact the environment and supports a FONSI. Consequently, an Environmental Impact Statement is not needed.

Copies of the Draft SEA and FONSI are available for review until Feb. 17, 2013 at the Upper Marlboro Branch Library at 14730 Main St., Upper Marlboro, MD 20772, at the Joint Base Andrews Library at 1642 Brookley Ave and D Street, and online at (<http://www.andrews.af.mil/library/environmental/index.asp>).

Please send written comments to Ms. Anne Hodges, 11 CES/CEAO, 3466 North Carolina Avenue, Joint Base Andrews, MD 20762 or email to [anne.hodges@afncr.af.mil](mailto:anne.hodges@afncr.af.mil).



Sustainable \_\_\_\_\_ Attainable \_\_\_\_\_

Maryland Department of Planning

February 6, 2013

Ms. Anne Hodges, Environmental Planner, Asset Optimization  
Department of the Air Force  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

**STATE CLEARINGHOUSE REVIEW PROCESS**

State Application Identifier: MD20130129-0062  
Reply Due Date: 02/25/2013  
Project Description: Draft Supplemental Environmental Assessment and FONSI: Construction of Personally- Owned  
Vehicle Parking for the 113th Wing, District of Columbia Air National Guard on Joint Base Andrews-Naval Facility  
(see MD20130103-0001)  
Project Location: County of Prince George's  
Clearinghouse Contact: Bob Rosenbush

Dear Ms. Hodges:

Thank you for submitting your project for intergovernmental review. Your participation in the Maryland Intergovernmental Review and Coordination (MIRC) process helps to ensure that your project will be consistent with the plans, programs, and objectives of State agencies and local governments.

We have forwarded your project to the following agencies and/or jurisdictions for their review and comments: the Maryland Department(s) of Natural Resources, the Environment, Transportation; the County of Prince George's; the Metropolitan Washington Council of Governments, the Maryland-National Capital Park and Planning Commission in Prince George's County; and the Maryland Department of Planning; including the Maryland Historical Trust. A composite review and recommendation letter will be sent to you by the reply due date. Your project has been assigned a unique State Application Identifier that you should use on all documents and correspondence.

Please be assured that we will expeditiously process your project. The issues resolved through the MIRC process enhance the opportunities for project funding and minimize delays during project implementation.

If you need assistance or have questions, contact the State Clearinghouse staff noted above at 410-767-4490 or through e-mail at [brosenbush@mdp.state.md.us](mailto:brosenbush@mdp.state.md.us). Thank you for your cooperation with the MIRC process.

Sincerely,



Linda C. Janey, J.D., Assistant Secretary

*P.S. Great News!! Your project may be eligible to be "FastTracked" through the State permitting processes. For more information, go to: <http://easy.maryland.gov/wordpress/fasttrack/>.*

LCJ:BR  
13-0062 NRR.NEW.doc

Martin O'Malley, Governor  
Anthony G. Brown, Lt. Governor

Richard Eberhart Hall, AICP, Secretary  
Matthew J. Power, Deputy Secretary

301 West Preston Street - Suite 1101 - Baltimore - Maryland - 21201  
Tel: 410.767.4500 - Toll Free: 1.877.767.6272 - TTY users: Maryland Relay - [Planning.Maryland.gov](http://Planning.Maryland.gov)



Sustainable\_\_\_\_\_Attainable

March 7, 2013

Ms. Anne Hodges  
Environmental Planner, Asset Optimization  
Department of the Air Force  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

**STATE CLEARINGHOUSE RECOMMENDATION**

**State Application Identifier:** MD20130129-0062

**Applicant:** Department of the Air Force

**Project Description:** Draft Supplemental Environmental Assessment and FONSI: Construction of Personally- Owned Vehicle Parking for the 113th Wing, District of Columbia Air National Guard on Joint Base Andrews-Naval Facility (see MD20130103-0001)

**Project Location:** Prince George's County

**Recommendation:** Consistent with Qualifying Comments and Contingent Upon Certain Actions

Dear Ms. Hodges:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 34.02.01.04-.06, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter constitutes the State process review and recommendation based upon comments received to date. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Departments of Natural Resources, Transportation, the Environment, Prince George's County, the Maryland-National Capital Park and Planning Commission in Prince George's County, the Metropolitan Washington Council of Governments, and the Maryland Department of Planning, including the Maryland Historical Trust. As of this date, the Maryland Department of Natural Resources; and the Metropolitan Washington Council of Governments have not submitted comments. **This recommendation is contingent upon the applicant considering and addressing any problems or conditions that may be identified by their review. Any comments received will be forwarded.**

The Maryland-National Capital Park and Planning Commission in Prince George's County stated that their findings of consistency are contingent upon the applicant taking the actions summarized below. The project is for a parking lot located at the Joint Base Andrews Naval Facility. No exhibits or plans were included. According to the review document, the proposed project will result in the permanent loss of wetlands and woodlands. Impacts to wetlands on the site will be subject to the Clean Water Act and review and approval by the Army Corps of Engineers. Impacts to woodland resources will be subject to the Forest Conservation Act.

Martin O'Malley, Governor  
Anthony G. Brown, Lt. Governor

Richard Eberhart Hall, AICP, Secretary  
Matthew J. Power, Deputy Secretary

---

301 West Preston Street - Suite 1101 - Baltimore - Maryland - 21201  
Tel: 410.767.4500 - Toll Free: 1.877.767.6272 - TTY users: Maryland Relay - Planning.Maryland.gov

Ms. Anne Hodges  
March 7, 2013  
Page 3  
State Application Identifier: MD20130129-0062

If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at [brosenbush@mdp.state.md.us](mailto:brosenbush@mdp.state.md.us).

Thank you for your cooperation with the MTRC process.

Sincerely,



Linda C. Janey, J.D., Assistant Secretary

LCJ:BR  
Enclosures

cc: Beth Cole - MHT  
Greg Golden - DNR  
Amanda Degen - MDE  
Melinda Gretsinger - MDOT  
Beverly Warfield - PGEO  
Greg Goodwin - MWCOG  
Jay Mangalvedhe -  
MNCPPCP

13-0062\_CRR.CLS.doc





## MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore, Maryland 21230  
410-537-3000 • 1-800-633-6101 • <http://www.mde.state.md.us>

Martin O'Malley  
Governor

Anthony G. Brown  
Lieutenant Governor

Robert M. Summers, Ph.D.  
Secretary

February 22, 2013

Ms. Anne Hodges  
Environmental Planner  
Department of the Air Force  
Asset Optimization  
11 CES/CEAO  
3466 North Carolina Avenue  
Joint Base Andrews, MD 20762

RE: State Application Identifier: MD20130129-0062  
Project: Draft Supplemental Environmental Assessment and FONSI: Construction of Personally- Owned Vehicle Parking for the  
113th Wing, District of Columbia Air National Guard on Joint Base Andrews-Naval Facility (see MD20130103-0001)

Dear Ms. Hodges:

Thank you for the opportunity to review the above referenced project. The document was circulated throughout the Maryland Department of the Environment (MDE) for review, and the following comments are offered for your consideration.

1. Construction, renovation and/or demolition of buildings and roadways must be performed in conformance with State regulations pertaining to "Particulate Matter from Materials Handling and Construction" (COMAR 26.11.06.03D), requiring that during any construction and/or demolition work, reasonable precaution must be taken to prevent particulate matter, such as fugitive dust, from becoming airborne.
2. If boilers or other equipment capable of producing emissions are installed as a result of this project, the applicant is requested to obtain a permit to construct from MDE's Air and Radiation Management Administration for this equipment, unless the applicant determines that a permit for this equipment is not required under State regulations pertaining to "Permits, Approvals, and Registration" (COMAR 26.11.02.). A review for toxic air pollutants should be performed. Please contact the New Source Permits Division, Air and Radiation Management Administration at (410) 537-3230 to learn about the State's requirements and the permitting processes for such devices.
3. If soil contamination is present, a permit for soil remediation is required from MDE's Air and Radiation Management Administration. Please contact the New Source Permits Division, Air and Radiation Management Administration at (410) 537-3230 to learn about the State's requirements for these permits.
4. If a project receives federal funding, approvals and/or permits, and will be located in a nonattainment area or maintenance area for ozone or carbon monoxide, the applicant should determine whether emissions from the project will exceed the thresholds identified in the federal rule on general conformity. If the project emissions will be greater than 25 tons per year, contact James Wilkinson, Air and Radiation Management Administration, at (410) 537-3245 for further information regarding threshold limits.
5. Fossil fuel fired power plants emit large quantities of sulfur oxide and nitrogen oxides, which cause acid rain. In addition, nitrogen oxide emissions contribute to the problem of global warming and also combine with volatile organic compounds to form smog. The MDE supports energy conservation, which reduces the demand for electricity and therefore, reduces overall emissions of harmful air pollutants. For these reasons, MDE recommends that the builders use energy efficient lighting, computers, insulation and any other energy efficient equipment. Contact the U.S. EPA at (202) 233-9120 to learn more about the voluntary Green Lights Program which encourages businesses to install energy-efficient lighting systems.
6. The applicant should be advised that no outback asphalt should be used during the months of June, July and August.
7. Development should be concentrated in suitable areas such as existing or planned population centers as identified in a county's

Ms. Anne Hodges  
February 21, 2013  
Page Two

*MD 20130129-0062*

comprehensive plan.

8. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.
9. In addition, information from MDE's Science Services Administration is enclosed.

Again, thank you for giving MDE the opportunity to review this project. If you have any questions or need additional information, please feel free to call me at (410) 537-4120.

Sincerely,

*Amanda R. Degen*

Amanda R. Degen  
MDE Clearinghouse Coordinator  
Office of Communications

Enclosure  
cc: Bob Roscnbush, State Clearinghouse

**Draft EA: Construction of Parking for 113th Wing of DC Air National Guard Joint Base  
Andrews**

**Maryland Department of the Environment - Science Services Administration**

**REVIEW FINDING: R2 Contingent Upon Certain Actions  
(MD2013 0129-0062)**

The following additional comments are intended to alert interested parties to issues regarding water quality standards. The comments address:

**A. Water Quality Impairments:** Section 303(d) of the federal Clean Water Act requires the State to identify impaired waters and establish Total Maximum Daily Loads (TMDLs) for the substances causing the impairments. A TMDL is the maximum amount of a substance that can be assimilated by a waterbody such that it still meets water quality standards.

**Planners should be aware of existing water quality impairments identified on Maryland's 303(d) list. The Project is situated in the Piscataway Creek watershed, identified by the MD 8-digit codes, 02140203, which is currently impaired by several substances and subject to regulations regarding the Clean Water Act.**

Planners may find a list of nearby impaired waters by entering the 8-digit basin code into an on-line database linked to the following URL:  
<http://www.mde.state.md.us/programs/Water/TMDL/Integrated303dReports/Pages/303d.aspx>.

This list is updated every even calendar year. Planners should review this list periodically to help ensure that local decisions consider water quality protection and restoration needs. **Briefly, the current impairments that are relevant to the Project include the following:**

**Piscataway Creek (02140203):**

|                    |   |
|--------------------|---|
| <b>Nutrients:</b>  | Tidal. A TMDL is pending development.                   |
| <b>Sediments:</b>  | Tidal. A TMDL is pending development.                   |
| <b>Bacteria:</b>   | Non-tidal. A TMDL has been written and approved by EPA. |
| <b>Biological:</b> | Non-tidal. A TMDL is pending development.               |

**B. TMDLs:** Development and implementation of any Plan should take into account consistency with TMDLs developed for the impaired waterbodies referenced above. Decisions made prior to the development of a TMDL should strive to ensure no net increase of impairing substances. TMDLs are made available on an updated basis at the following web site:

MD 20130129-0062

<http://www.mde.state.md.us/programs/Water/TMDL/CurrentStatus/Pages/Programs/WaterPrograms/TMDL/Summittals/index.aspx>

Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland's anti-degradation policy;

**C. Anti-degradation of Water Quality:** Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called "anti-degradation policies." This policy states that "proposed amendments to county plans or discharge permits for discharge to Tier II waters that will result in a new, or an increased, permitted annual discharge of pollutants and a potential impact to water quality, shall evaluate alternatives to eliminate or reduce discharges or impacts." These permitted annual discharges are not just traditional Point Sources, it can include all discharges such as Stormwater.

**Piscataway Creek 1, which is located within the scope of the Project, has been designated as a Tier II stream. The location of the project is within the catchment of the High Quality Water (Tier II segment). (See Additional Comments and attached map)**

**For more information regarding any disturbances (i.e. Construction) within a Tier II Catchment contact Angel Valdez at 410-537-3606.**

Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on Tier II waters can be obtained online at: <http://www.dsd.state.md.us/comar/getfile.aspx?file=26.08.02.04.htm> and policy implementation procedures are located at <http://www.dsd.state.md.us/comar/getfile.aspx?file=26.08.02.04-1.htm>

Planners should also note that since the Code of Maryland Regulations is subject to periodic updates. A list of Tier II waters pending Departmental listing in COMAR can be found, with a discussion and maps for each county, at the following website: <http://www.mde.state.md.us/programs/researchcenter/EnvironmentalData/Pages/researchcenter/data/waterqualitystandards/antidegradation/index.aspx>

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MD 20130129-0062

**ADDITIONAL COMMENTS****Antidegradation**

Table 1: General Comments regarding Current Antidegradation Implementation Procedures.

| For all land disturbing projects that do not implement a no-discharge alternative and therefore may adversely impact Tier II waters, MDE will require: |   |
|--|---|
| 1.   | MDE approval of all design elements and practices required by mandatory implementation of Environmental Site Design (ESD) to the maximum extent practicable and applicable innovative development practices as currently required by COMAR 26.08.02.04-1(K)(2) and the 2007 Stormwater manual (see, <a href="http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/Pages/Programs/WaterPrograms/SedimentandStormwater/swm2007.aspx">http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/Pages/Programs/WaterPrograms/SedimentandStormwater/swm2007.aspx</a> ). MDE is also recommending ESD be employed for projects that are individually of minimal impact to Tier II resources, to account for the total cumulative effects of each project. Current precedents for this requirement/recommendation can be found in Appendix 1 to these comments). |
| 2.   | Mandatory Riparian buffers determined in consideration of slope and soil type, with a minimum of 100 ft in all areas. Buffer requirements are based on similar requirements in the Critical Areas Program and the Chesapeake Bay Riparian Buffer/Reforestation Goals and other water quality objectives). Additional buffers beyond the minimum 100' will be required on sites with slopes greater than 5% and/or with poorly infiltrating soils. See Appendix 2 for guidance.  |
| 3.   | *Biological, chemical, and flow monitoring in the Tier II watershed by the applicant to determine remaining AC and any cumulative impacts of current and future developments for larger projects and/or in watersheds with little remaining forest buffering/AC.  |
| 4.   | Additional practices to protect the Tier II watershed may also be required, such as enhanced sediment and erosion control practices, depending on the potential for project-specific impacts to water quality   |
| Where 1 and 2 above cannot be fully implemented  | Applicant is required to submit a detailed hydrologic study and alternatives analysis to demonstrate assimilative capacity will be maintained. If it is determined by MDE assimilative capacity still will not be maintained after the above analysis, an SEJ will be required.   |

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MD20130129-00

## Appendix 1

### MARYLAND DEPARTMENT OF THE ENVIRONMENT MDE 1800 Washington Boulevard • Baltimore MD 21230 410-537-3000 • 1-800-633-6101

Martin D. Malley  
Governor

Anthony G. Brown  
Lieutenant Governor

Shari T. Wilson  
Secretary

Robert M. Summers, Ph.D.  
Deputy Secretary

JUN - 8 2009

The Honorable Julia W. Gouge, President  
Board of County Commissioners  
Carroll County, Maryland  
County Office Building  
Room 300  
225 North Center Street  
Westminster MD 21157

Dear Commissioner Gouge:

The Maryland Department of the Environment (MDE) has completed a final review of the Fall 2008 Amendment Cycle (Cycle) to the 2007 Carroll County Water and Sewerage Plan. The Cycle consists of five amendments. Three amendments involve Hampstead: annexations Nos. 30 (Summit Street/Taylor Street) and No. 32 (Crockett Property); and, the Hampstead Industrial Exchange, Solo Cup Lot 2, & IDA Property. For the other two amendments, one is for the Liberty Road Crossing Multi-Use water and wastewater systems - for a proposed business center near Taylorville; and, the final amendment is for the New Windsor Agriculture Easement Properties.

During MDE's review of the Cycle, the Maryland Department of Planning (MDP) advised MDE that the Cycle is consistent with the Carroll County Comprehensive Plan (enclosed comments). You may recall that MDE had expressed water resource concerns for the three Hampstead amendments and for the Liberty Road Crossing amendment, and needed more time to complete a review of these four amendments. The review period, set to expire on March 10, 2009, was extended until June 8, 2009. The amendment for the New Windsor Agriculture Easement Properties was approved by MDE in my enclosed March 3, 2009 letter to you.

For the three Hampstead amendments, MDE's Water Supply Program (WSP) is concerned that proposed growth may exceed the Town's water supply capacity (enclosed comments). In an effort to assist Hampstead to strengthen its water supply, a new water appropriation permit has been issued by MDE. While this important action may be considered to be a short term benefit, concerns remain as to the viability of the water supply for future growth.

The Department requests that Hampstead prepare a water capacity management plan and forward it to the WSP for review by December 31, 2009. By copy of this letter, representatives of Hampstead are advised to contact the WSP by calling 410-537-3703. The Hampstead amendments are approved with the condition that water resource issues remain which may impact future growth.

Enclosed For

www.mde.state.md.us

TTY: 410-537-7333  
Via Maryland Relay Service

The Honorable Julia W. Gouge  
Page Two

For the Liberty Road Crossing amendment, MDE's Science Services Administration (SSA) has performed a screening analysis for potential impacts to the Tier II watershed above the Gillis Falls I Tier II segment. The SSA advises that their analysis indicates no probable impacts due to the size, location, and nature of the development relative to both the Tier II segment and the watershed's assimilative capacity. The SSA has determined that this project will not require further anti-degradation review.

The Department requests that the County implement environmental site design (ESD) to the maximum extent practicable for Liberty Road Crossing to minimize any potential water quality impacts associated with storm water runoff generated from impervious or other hard surfaces. Since the development is more than 150 meters from the closest stream channel, the Department has no current cause for concern regarding project impacts to riparian buffers. Implementing ESD now will help protect the watershed from any cumulative impacts associated with this and future development activities.

By copy of this letter, representatives of 2515 Liberty, LLC and the County may contact the SSA by calling 410-537-3572 to discuss the analysis, and, for specific questions regarding MDE's Sediment, Stormwater, and Dam Safety program (SSDS) and ESD, please call 410-537-3561. The Liberty Road Crossing amendment is approved.

This action completes MDE's review of the Cycle, as required by Section 9-507 of the Environment Article of the Annotated Code of Maryland. If you need further assistance on these matters, please contact Virginia F. Kearney, Deputy Director at 410-537-3512, toll-free at 800-633-6101 or by e-mail at [vkearney@mde.state.md.us](mailto:vkearney@mde.state.md.us).

Sincerely,

*Virginia F. Kearney*

Jay Sakal, Director  
Water Management Administration

Enclosures

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MD20130129-0062

## Appendix 2

Maryland riparian buffering requirements in Tier II watersheds developed from modified USDA Forest Service recommendations\*.

| Adjusted Average Optimal Buffer Width Key for<br>HQ Waters (minimum width 100 feet) |        |       |        |      |
|---|--------|-------|--------|------|
| Soils   | Slopes |       |        |      |
|   | 0-5%   | 5-15% | 15-25% | >25% |
| ab  | 100    | 130   | 160    | 190  |
| c   | 120    | 150   | 180    | 210  |
| d   | 140    | 170   | 200    | 230  |

\*Johnson, C. W. and Bueffer, S. 2008. Riparian buffer design guidelines for water quality and wildlife habitat functions on agricultural landscapes in the Intermountain West, Gen. Tech. Rep. RMRS-GTR-203. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. Also Available at [http://www.fs.fed.us/rm/pubs/rmrs\\_gtr203.pdf](http://www.fs.fed.us/rm/pubs/rmrs_gtr203.pdf)

### Chesapeake Bay TMDL

With the completion of the Chesapeake Bay TMDL, the Chesapeake Bay Program Office (CBPO) will be able to provide loading data at a more refined scale than in the past. MDE will be able to use the CBPO data to estimate pollution allocations at the jurisdictional level (which will include Federal Facilities) to provide allocations to the Facilities. These allocations, both Wasteload (WLA) and Load Allocation (LA) could call for a reduction in both Point Sources and Nonpoint Sources. **Facilities should be aware of reductions and associated implementation required by WIPs or FIPs.**

### Stormwater

The project should consider all Maryland Stormwater Management Controls. Site Designs should consider all Environmental Site Design to the Maximum Extent Practicable and "Green Building" Alternatives. Designs that reduce impervious surface and BMPs that increase runoff infiltration are highly encouraged.

#### Further Information:

<http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/Pages/Programs/WaterPrograms/SedimentandStormwater/swm2007.aspx>

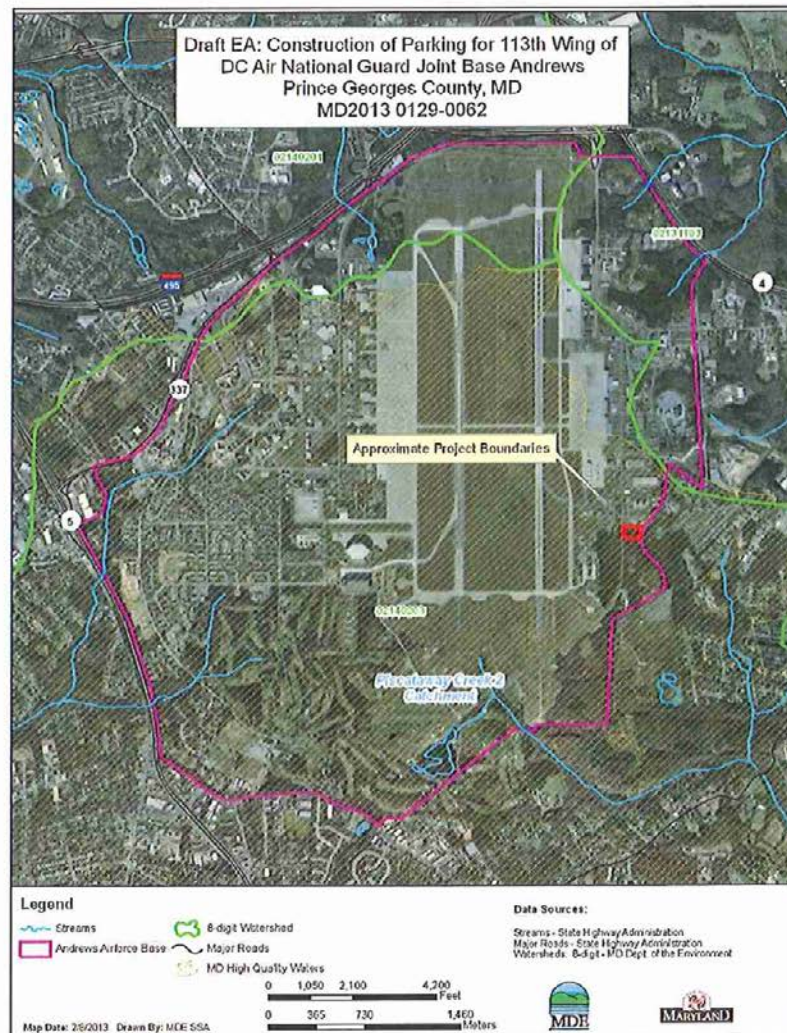
#### Environmental Site Design (Chapter 5):

<http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/MarylandStormwaterDesignManual/Documents/www.mde.state.md.us/assets/document/chapter5.pdf>

#### Redevelopment Regulations:

<http://www.dsd.state.md.us/comar/comarhtml/26.17.02.05.htm>

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*Handwritten signature*

## COMMENTS AND RESPONSES

This appendix contains comments received during the public comment period for this supplemental environmental assessment. The public and agency review of the Draft SEA began with a publication of the notice of availability in the *Andrews Gazette* on 18 January 2013. The public review period continued through 17 February 2013. Additional time was provided to ensure that all agency comments were received. Copies of the Draft SEA were available for review at the Upper Marlboro Branch Library at 14730 Main St., Upper Marlboro, MD 20772, and at the Joint Base Andrews Library at 1642 Brookley Ave and D Street. The SEA was also made available online at <http://www.andrews.af.mil/library/environmental/index.asp>.

No comments were received from the general public. Agency responses were received from Maryland Department of Transportation (MDOT), Maryland Department of Planning (MDP), Prince George's County, MD (PGC), and Maryland Department of the Environment (MDE) and its divisions.

In accordance with the National Environmental Policy Act (NEPA), agency comments were reviewed and have been incorporated into this SEA as described below. Both MDOT and MDP found this project to be consistent with their plans, programs, and objectives. PGC and MDE each submitted comments and are have been responded to as follows:

### Prince George's County:

Prince Georges County recommended minimizing impacts to wetlands, wetland buffers, forest, and streams by decreasing the amount of disturbance to the natural landscape by preserving onsite natural resources. They noted that the proposed development is located upstream of a stronghold watershed and Tier II waters (021402030803).

JBA would like to thank the County for their comments regarding preservation of environmental resources. The recommendations from PGC were investigated in the initial design phase. Steps were taken at that point, with the input of the Army Corps of Engineers (ACOE) and MDE wetland and waterways consulting reviewers and specialists to redesign the project, and scale back impacts as much as possible.

A Wetland/Waterways pre-application meeting was held onsite on January 12, 2012 and attended by Erica Schmidt (ACOE- Permit Reviewer), Lise Doesman (MDE- Wetland Delineation Specialist), Kelly Neff (MDE-Wetland Mitigation Specialist ), Imtiaz Choudry (MDE- Waterway Specialist), Mike Klebasko (Environmental Scientist- Klebasko Environmental Consulting Group), Andie Murtha and Jason Mills (Environmental Scientist and Engineer, respectively -LSA Consulting Engineers), Captain Duane Peterson (113 CES) Robin Robinson (113 CES) and Dan Mallam (113 CES), from the 11 CES Aaron Sprouse and Michelle Quinn. The consensus from that meeting was that the parking facility would be redesigned and all impacts to wetlands would be removed. Temporary impacts to wetland buffers would be tolerated with the redesign. Finally, impacts to a man-made ditch that conveys storm water and minimal perennial base flow would be regulated.

As a result of the onsite consultation in January 2012, wetland impacts were eliminated and wetland buffer impacts were reduced to their minimums. Additionally, impacted forest resources were also

lessened, and the net impact will be replanted at another location on JBA at the Air Force's required mitigation rate..

### **The Maryland Department of the Environment**

MDE submitted comments that outlined all pertinent laws and regulations associated with the project's design and construction phases. JBA acknowledges all of those requirements and will be designing and constructing within those stated parameters. This letter is included within this appendix section.

MDE Science Services Administration (MDE-SSA) submitted supplemental comments along with the general comments from MDE. MDE-SSA included specific information regarding the water quality of surrounding impaired watersheds and information on Total Maximum Daily Loads (TDML) for substances causing impairments. The MDE-SSA reminded that Piscataway Creek, located within the scope of the project is recognized as a Tier II stream and specific protection measures required by Maryland Law pertain to it.

### **Conclusion**

Andrews would like to thank MDE-SSA for their comments to emphasize and describe the categorization of the Piscataway Creek as a Tier II stream. JBA acknowledges this status and will be following the required state laws to respect the status.

**APPENDIX B**  
FINDING OF NO SIGNIFICANT IMPACT

## **FINDING OF NO SIGNIFICANT IMPACT**

### **SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED CONSTRUCTION OF PERSONALLY OWNED VEHICLE PARKING FOR 113TH WING, DISTRICT OF COLUMBIA AIR NATIONAL GUARD AT JOINT BASE ANDREWS-NAVAL FACILITY (JBA), WASHINGTON, MARYLAND**

#### **Introduction**

The Proposed Action and the No Action Alternative were assessed in the attached Supplemental Environmental Assessment (EA). A Supplemental EA has been prepared to evaluate the Proposed Action and the No Action Alternative. Resources considered in the impact analysis include water resources and biological resources. This Supplemental EA examines the potential impacts on the environment from the Proposed Action, which was not specifically addressed in the *Environmental Assessment for FY07-11 BRAC Construction Requirements at Andrews Air Force Base, Maryland September 2007* and associated **FONSI**, but is consistent with the assessed installation development actions. In accordance with the Council on Environmental Quality (CEQ) regulations on implementing the National Environmental Policy Act (NEPA), this Supplemental EA for the construction of a POV parking facility as part of the District of Columbia Air National Guard 113th Wing (DC ANG) will be “tiered” to the approved ***Environmental Assessment for FY07-11 BRAC Construction Requirements at Andrews Air Force Base, Maryland September 2007***.

#### **Purpose of and Need for the Proposed Action**

The purpose of the proposed action is to support the current and future demand of the DC ANG training and security actions within the National Capital Region (NCR). Current parking facilities within the license area afforded to the DC ANG cannot support the present staffing and the present parking configuration does not comply with UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*, 9 February 2012. Changes needed to implement these standards require reconfiguration of existing facilities to provide a minimum standoff distance buffer zone (*Appendix B: Section B-1.1: Standoff Distances*). This change will significantly lessen the already insufficient parking facilities and thus, will not provide adequate facilities for all of the required personnel. Currently 577 weekday personnel and 1197 weekend personnel must report for duty. Increased staffing due to BRAC activity will be augmenting these numbers. This Supplemental EA is tiered to the approved *Environmental Assessment for FY07-11 BRAC Construction Requirements at Andrews Air Force Base, Maryland September 2007*.

#### **Description of the Proposed Action**

Under the Proposed Action, DC ANG would construct a satellite parking facility on a 2.6 acre wooded site south of its designated license area. The Proposed Action would provide 138 parking spaces for use by DC ANG personnel. This facility will replace 138 of the 155 parking spaces lost due to reconfiguration existing site to meet current appropriate antiterrorism standards, as outlined in UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*, 9 February 2012.

### **No Action Alternative**

Under the No Action Alternative, the satellite parking facility would not be built. DC ANG would not be able to construct additional parking and significant number of essential personnel would be unable to efficiently access base facilities for daily and emergency activities. The No Action Alternative would be an infeasible alternative as the DC ANG would not be able to meet its primary objectives.

### **Alternatives Considered but Eliminated from Further Consideration**

The necessity of the proposed action for construction of a new satellite parking facility (as stated above) resulted from newly imposed limitations set forth by the *DoD Minimum Antiterrorism Standards*. A planning review of the DC ANG license area and areas within a reasonably distanced outside radius, provided no alternative sites for evaluation. Constraints within the evaluated radius area included the 'Pathfinder Fence'. Parking of non-government vehicles is not permitted within the Pathfinder Fence. The appropriate antiterrorism standards also constrain all surrounding buildings by diminishing their existing parking facilities. The area surrounding the DC ANG is at present completely developed, with the exception of the aforementioned wooded site to the south of the license area.

### **Environmental Impacts of the Proposed Action**

Analysis performed in the Supplemental EA addressed potential effects of construction and development on water and biological resources. The analysis indicates that implementing the Proposed Action would have no significant direct or indirect cumulative effects on the quality of the natural or human environment. Additionally, wetland and forest resources would be minimally impacted by the Proposed Action but mitigation efforts will be employed to alleviate any future degradation.

#### **Impacts Assessment**

The Proposed Action:

- Is consistent with the current comprehensive development plan for JBA
- Does not impact farmland
- Does not impact neighborhoods, communities, or recreation areas
- Does not impact traffic safety
- Does not impact air quality
- Does not affect noise levels
- Does not significantly affect wildlife or threatened or endangered species
- Does not impact historic or archeological preservation
- Does not impact floodplain
- Does not impact hazardous waste sites
- Is in compliance with ADA regulations
- Impacts wetlands and forests (see below)

### **Notice of Wetland Involvement**

As guided by Executive Order (EO) 11990, *Protection of Wetlands*, and Air Force Instruction (AFI) 32-7064, 17 September 2004, *Integrated Natural Resources Management*, the U.S. Air Force (USAF) hereby provides notice of the potential for wetland impacts within wetlands associated with Piscataway Creek, which flows into Patuxent River. Jurisdictional wetland buffers within the project area, occur within the limits of disturbance (LOD) of the proposed parking facility. Actual wetlands occur adjacent to the proposed site, outside the project area, to the south and west. The wetland presently receives overland flow, discharge from SWM pipes, and water from several culverts. Impacts to this wetland buffer would occur as a result of the construction of the proposed parking facility. In addition, impacts to the wetlands could occur due to landform modifications, which may impede flow from sources feeding these wetlands. This impact is to wetland buffer and not the actual wetland.

Permanent loss of wetland acreage would require a U.S. Army Corps of Engineers Clean Water Act (CWA) Section 404(b) permit. The USAF is committed to mitigating the loss of the wetland area through either creation of a similar feature nearby, or enhancing the existing wetlands, as required. Permitting would be determined based on negotiations between the USAF, DC ANG and the MDE.

As previously stated, the plan does not currently impact the surrounding wetlands so no mitigation is required for loss of wetland acreage. At this time, no mitigation is required for wetland buffer impacts.

### **Notice of Forest Involvement**

As guided by the AFI 32-7064, 17 September 2004, *Integrated Natural Resources Management*, and the *Revised Integrated Natural Resources Management Plan (2006-2011) for AAFB*, any removal of trees must be mitigated. Construction of the 113 ANG parking lot would result in the long-term loss of less than 2.0 acres of mixed hardwood forest. The size of the forested area to be cleared represents a negligible (<0.0001) percentage of the remaining forest cover within the State of Maryland (MDNR 2003) and a negligible (<0.003) percentage of forest cover at JBA. Following project implementation, JBA would replace 60 percent of the lost forest canopy for the construction of the parking lot per Joint Base Andrews Environmental Protection Standards for Contracts.

Based on the *Andrews AFB 2007d standard*, replacement trees must be native species, with a 2-5 inch caliper, and would be arranged in stands similar to those removed. Additionally, the project will meet or exceed regulations required by the State of Maryland Forest Conservation Act.

### **Public Review and Interagency Coordination**

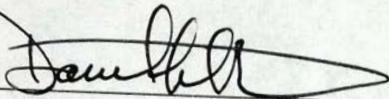
Federal, state, and local agencies listed in Appendix A of the Supplemental EA were contacted for comment on the Proposed Action. Agency comments were included in the analysis. Based on the provisions set forth in the Proposed Action, all activities were found to comply with the criteria or standards of environmental quality and coordinated with the appropriate federal, state, and local agencies. A draft of this FONSI was made available to the public. Additionally, copies of the draft FONSI were forwarded to federal, state, and local agencies for review and comment.



Supplemental Environmental Assessment for Joint Base Andrews-Naval Air Facility, Washington, MD

**Finding of No Significant Impact**

Based on the information and analysis presented in the EA conducted in accordance with the requirements of the National Environmental Policy Act, the Council on Environmental Quality regulations, implementing regulations set forth in 32 Code of Federal Regulations 989 (*Environmental Impact Analysis Process*), as amended, and review of the public and agency comments submitted during the 30-day public comment period, I conclude that the environmental effects of activities contributing to development of the proposed parking facility to service the DC ANG are not significant and that a FONSI is appropriate; therefore, preparation of an Environmental Impact Statement is unnecessary and will not be prepared.



DANIEL L. WATERS, Colonel, USAF  
Vice Commander, 11th Wing

13 Aug 2013

Date

**APPENDIX C**  
**URS MEMORANDUM**



#### Discussion and Recommendations

In order to ensure the remedy is operational as designed, it is important to assess changes in land use within the LF-05 drainage basin. The LF-05 drainage basin (see hatched area on Figure 1) is a combination of surface water tributary area and the limits of groundwater gradients directed towards LF-05, plus a relatively small buffer area to account for uncertainties in these features. The drainage basin was delineated along prominent surface features (e.g., roads and buildings) to facilitate regulation of surface water drainage within this area. The surface water drainage in the vicinity of the restricted area is illustrated in Figure 2. The groundwater gradients in the vicinity of the restricted area are illustrated in Figure 3.

Any profound changes in land use within the LF-05 drainage basin would require consideration of the impacts to surface drainage and groundwater recharge within the LF-05 basin. In summary, collection and discharge of excess precipitation cannot adversely affect discharges from the LF-05 cap drainage ways; and excess water cannot be recharged to the groundwater that flows into the LF-05 footprint. In simple English, the design firm planning and constructing buildings in the LF-05 drainage basin should be required to adhere to the following constraints during construction and for the long term stormwater discharges that occur within the limits of construction:

*Any surface water and groundwater discharge within the limits of construction should be no greater than pre-development conditions.*

This requirement serves two purposes. The first is to assure that excess flow to the tributaries of Piscataway Creek (southwest of LF-05) does not impede water flowing from the discharge pathways at LF-05. The net effect of inhibiting discharge from LF-05 over a protracted timeframe could be detrimental to vegetation and embankment slope stability. The second purpose is to limit the elevations of the groundwater table beneath LF-05 in order to minimize contact with buried waste. To achieve this goal, the current loading of precipitation to groundwater cannot be exceeded.

#### Design Variables for Stormwater Management

On the basis of the constraints above, the following design criteria will need to be considered by the construction contractor, based on the experience gained during the permitting and construction of LF-05):

- 1) Considering the above constraint on discharge to surface water, the Soil Erosion and Sediment Control (SESC) Plans implemented during construction will need controlled discharges to receiving waters in accordance with the outcome of the hydrologic analysis performed by the design contractor. This analysis should consider the receiving stream's capacity for more influent during design storm events. This analysis is necessary to mitigate the impact on receiving drains and channels into which LF-05 discharges. Similarly, long term collection and discharge of stormwater also must meet the same constraints. It is counter-productive to optimize the long term operation of the LF-05 remedy to allow retention basins or infiltration basins that create standing water and encourage groundwater recharge that will raise water levels beneath the landfill. This condition also creates a bird habitat. Instead, detention basins as opposed to retention basins, designed to receive the peak flows and total volume from a design storm then discharged in a controlled fashion to the receiving waters are consistent with optimization of the long term operations for this site. Considerations should also be given to rerouting flows to different receiving waters as needed or desired to meet the pre-development criteria.